

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

JANE DOE,

Plaintiff,

v.

AMAZON.COM, INC., a Delaware  
corporation, and IMDB.COM, INC., a  
Delaware corporation,

Defendants.

No. 2:11-CV- 01709-JCC

**DECLARATION OF ASHLEY A.  
LOCKE IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS  
PURSUANT TO RULE 12(b)(6)**

I, Ashley A. Locke, hereby declare as follows:

1. I am an associate with Perkins Coie LLP. I am one of the attorneys representing defendants Amazon.com, Inc. and IMDb.com, Inc. ("Defendants") in the above-referenced matter. I make this declaration based on personal knowledge and review of records and correspondence relating to the above-referenced matter.

2. Attached as Exhibit A is a true and correct copy of IMDbPro's Subscriber Agreement, available at <https://secure.imdb.com/signup/v4/help?h=agreement#privacy> (last accessed Nov. 9, 2011).

3. Attached as Exhibit B is a true and correct copy of IMDbPro's Privacy Policy, available at <https://secure.imdb.com/signup/v4/help?h=privacy> (last accessed Nov. 9, 2011).

DECLARATION OF ASHLEY A. LOCKE IN  
SUPPORT OF DEFENDANTS' MOTION TO DISMISS  
PURSUANT TO RULE 12(b)(6)  
(No. CV- 01709-JCC) – 1

24976-0480/LEGAL22091546.1

**Perkins Coie LLP**  
1201 Third Avenue, Suite 4800  
Seattle, WA 98101-3099  
Phone: 206.359.8000  
Fax: 206.359.9000

1           4.       Attached as Exhibit C is a true and correct copy of IMDbPro's privacy policy  
2 section titled, "Information You Give Us and How We Might Use It," *available at*  
3 [https://secure.imdb.com/signup/v4/help?h=privacy\\_use](https://secure.imdb.com/signup/v4/help?h=privacy_use) (last accessed Nov. 9, 2011).  
4

5           5.       Attached as Exhibit D is a true and correct copy of IMDbPro's "Frequently Asked  
6 Questions" section titled, "Is My Credit Card Secure?," *available at*  
7 <https://secure.imdb.com/signup/v4/faq?q=secure> (last accessed Nov. 9, 2011).  
8  
9

10           I declare under penalty of perjury under the laws of the United States that the foregoing is  
11 true and correct.  
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20  
21 DATED: November 9, 2011

By: /s/ Ashley A. Locke  
Ashley A. Locke

**CERTIFICATE OF SERVICE**

I certify that on November 9, 2011, I electronically filed the foregoing **DECLARATION OF ASHLEY A. LOCKE IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS PURSUANT TO RULE 12(b)(6)** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorneys of record

**John W Dozier , Jr**

Dozier Internet Law  
301 Concourse Blvd  
West Shore III , Ste 300  
Glen Allen, VA 23059

\_\_\_\_ Via hand delivery  
\_\_\_\_ Via U.S. Mail, 1st Class, Postage Prepaid  
\_\_\_\_ Via Overnight Delivery  
\_\_\_\_ Via Facsimile  
\_\_\_\_ Via Email  
  X   Via ECF

**Randall Moeller**

**Derek Alan Newman**  
Newman & Newman  
1201 Third Avenue, Ste 1600  
Seattle, WA 98

\_\_\_\_ Via hand delivery  
\_\_\_\_ Via U.S. Mail, 1st Class, Postage Prepaid  
\_\_\_\_ Via Overnight Delivery  
\_\_\_\_ Via Facsimile  
\_\_\_\_ Via Email  
  X   Via ECF \_\_\_\_\_

I certify under penalty of perjury that the foregoing is true and correct.

DATED this 9th day of November, 2011.

s/ Elizabeth McDougall

Elizabeth McDougall, WSBA No. 272026  
Breena M. Roos, WSBA No. 34501  
Ashley Locke, WSBA No. 40521

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Attorneys for Defendants Amazon.com, Inc.  
and IMDb.com, Inc.

DECLARATION OF ASHLEY A. LOCKE IN SUPPORT  
OF DEFENDANTS' MOTION TO DISMISS PURSUANT  
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(No. CV- 01709-JCC) – 3

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